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January 24, 2012

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VIA ECF & OVERNIGHT COURIER

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Room N406
Brooklyn, New York 11201

Re: Ross University. v. Brooklyn-Queens Health Care Inc.
No. 09 Civ. 1410 (KAM) (RLM)

Dear Judge Matsumoto:

Pursuant to this Court's Chambers Practices Paragraph IV.C.1(c), please find enclosed the following motion papers of Plaintiff Ross University School of Medicine, Ltd.:

Served December 2, 2011:

- (1) Memorandum of Law in Support of its Motion for Partial Summary Judgment and Appendix thereto;
- (2) Local Rule 56.1 Statement of Material Facts in Support of its Motion for Partial Summary Judgment;
- (3) Notice of Motion & Certificate of Service;
- (4) Memorandum of Law in Support of its Motion to Preclude Defendants' Expert Witness and Appendix thereto; and
- (5) Notice of Motion & Certificate of Service.

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Served January 11, 2011:


- (6) Response to Defendants' Memorandum of Law in Support of Their Motion for Partial Summary Judgment;
- (7) Response to Defendants' 56.1 Statement of Undisputed Facts & Additional Facts Requiring the Denial of Summary Judgment;
- (8) Declaration of Gillian L. Whittlesey in Support of Plaintiff's Response in Opposition to Defendants' Motion for Partial Summary Judgment;
- (9) Appendix Volumes I-III to Response to Defendants' 56.1 Statement of Undisputed Facts & Additional Facts Requiring the Denial of Summary Judgment;
- (10) Motion to Strike Portions of Defendants' L.R. 56.1 Statement of Undisputed Facts; and
- (11) Certificate of Service.

Served January 24, 2011:

- (12) Response to Defendants' Additional Material & Disputed Facts;
- (13) Reply in Support of its Motion for Partial Summary Judgment;
- (14) Reply in Support of its Motion to Preclude Defendants' Expert Witness; and
- (15) Certificate of Service.

In addition, pursuant to this Court's Chambers Practices two sets of courtesy copies are being delivered by overnight courier to this Court's chambers.

Respectfully submitted,


/s/ George J. Tzanetopoulos

cc: Walter P. Loughlin (via ECF & email)

Enc.